



DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action

Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: Edelman Leather (Former CEE Associates Facility)
 Facility Address: 80 Pickett District Road, New Milford, CT
 Facility EPA ID #: CTD044121697

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

If yes - check here and continue with #2 below.

If no - re-evaluate existing data, or

if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

RCRA RECORDS CENTER
 FACILITY CEE ASSOC
 I.D. NO. CTD 044121697
 FILE LOC. R-13
 OTHER *107209

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2. Is **groundwater** known or reasonably suspected to be "**contaminated**"¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

 x If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

_____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Facility Background:

The 80 Pickett District Rd. facility ("the facility") consists of an approximately 8-acre parcel on which a single-story building is located. The majority of the site is covered by the building and paved parking areas located on the northern and southern ends of the building. The property is located in an area classified as GB under the Connecticut Department of Environmental Protection (CT DEP). The nearest surface water body is the Housatonic River, which is located approximately 800 feet to the east of the site. The site was undeveloped prior to 1963, when the current site building was constructed. From 1964 until 1983, the property was owned and occupied by the Burndy Corporation, which had a metal plating operation and operated a RCRA-regulated surface impoundment as part of its wastewater treatment system. This unit and its associated sludge drying beds were closed by removal under a CT DEP-approved closure plan in the late 1980s. In 1983, the property was purchased by CEE Associates, LLC. A number of tenants occupied the property under their ownership. Diventco Corporation had an electroplating and dry film processing operation from 1983 until 1993. Colonial Data Services Corporation, a telephone equipment repair service, operated during the same time period. IntelliData Technologies Corporation used the property for warehousing, assembly, and distribution of electronic communication products from 1996 until 1999. On January 6, 2000, the property was transferred from CEE Associates LLC to the Edelman Limited Partnership. CEE was the certifying party on the Form III filing that accompanied the transfer under the CT Property Transfer Act.

Based on geologic logging conducted by ERM during advancement of overburden and bedrock boreholes, the Site is underlain by fine- to medium grained sand and gravel deposits over weathered dolomite marble over competent dolomite marble. The weathered bedrock layer ranges from 0 feet thick in the northern portion of the Site, where bedrock outcrops exist, to approximately 10 feet thick in the central eastern portion of the Site. In many cases, this upper weathered bedrock zone represents a relatively high permeability zone.

Regionally, the Site is located on relatively flat ground that slopes gently downward to the east toward the Housatonic River, which is located approximately 800 feet east of the Site and flows from north to south. Overburden groundwater flows directly to the east.

Current Understanding of Contamination in Groundwater:

The former hazardous waste storage area (AOC-4), former plating area (AOC-5), and stormwater vault (AOC-9) are understood to be the sources of contaminants in groundwater at the facility. Chlorinated volatile organic compounds (CVOCs), including trichloroethene, 1,1-dichloroethane, cis-1,2-dichloroethene, tetrachloroethene, and 1,1,1-trichloroethane, have been detected in groundwater above regulatory criteria. Figure 3 (attached) shows overburden concentrations of trichloroethene (TCE), the primary contaminant in groundwater, as presented in the January 2006 Annual Report of Status of Remediation. CVOCs that have been released to overburden groundwater are controlled by a curtain of air sparging wells located at the eastern property boundary, part of a soil vapor extraction/ air sparge system (SVE/AS) operating at the site since February 2006 to treat contaminated groundwater.

Due to previous detections of 1,1-dichloroethene in excess of the Connecticut Remediation Standard Regulation (RSR) Surface Water Protection Criteria (SWPC) in on-site open borehole bedrock wells BR-3 and BR-5, evaluation of groundwater flow in bedrock was performed in 2007 and 2008. Results of this evaluation showed limited transmissivity in competent bedrock. Waterloo profile results from along the eastern facility boundary showed that, except in the vicinity of the active "sparge wall" near ERM-11, which likely imparts turbulence to the system, the distribution of VOCs was limited to a thin (approximately 1 foot thick) layer at the weathered bedrock interface. These findings were confirmed by off-site investigations conducted recently to assess the distribution of VOCs off-site. These investigations included surface geophysics to identify the topography of the bedrock surface, and Waterloo Profiling to assess the vertical and horizontal distribution of VOCs in the overburden aquifer on the down-gradient properties. The results showed that chlorinated VOCs were present down-gradient of the Site, generally with higher concentrations at the overburden/bedrock interface, but nowhere present in excess of the RSR Surface Water Protection Criteria. Attached Figure 1 shows seismic lines from the 2008 geophysical survey and Waterloo profile locations. Figure 2 shows nearby landmarks, including the Edelman Leather facility and the Housatonic River.

Footnotes:

¹"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?

If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"²).

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): The concentrations of VOCs in down-gradient groundwater are much lower than those noted at the source areas. All concentrations measured in the Waterloo Profile sampling performed downgradient of the facility were found to be less than RSR SWPC (results attached). The Waterloo Profile sampling confirmed the conceptual model that the plume follows the surface of bedrock, with the highest concentrations present in the weathered bedrock interface. No evidence of NAPL was noted.

ERM has been evaluating the groundwater on the site since 1999, and concentrations of VOCs in groundwater have declined steadily since that time. This decline is related to the removal of the source material using an air sparge and SVE treatment system, along with some initial oxidant addition. Based on the review of data over time, the plume is stable and is anticipated to continue to decline in concentration. The presence of degradation by-products also indicates that natural processes continue to attenuate the plume.

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

X If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

All parameters found were present below the RSR SWPC. Based on the collected data (attached as described above), no significant impact to surface water is indicated. The following present the parameters identified, their maximum observed concentration, and their respective SWPC:

<u>-1,1-dichloroethene:</u>	<u>Max Observed Conc. - 76 ug/L;</u>	<u>Furthest down-grad - 14 ug/L; SWPC - 96 ug/L</u>
<u>Tetrachloroethene:</u>	<u>Max Observed Conc. - 2.9 ug/L;</u>	<u>Furthest down grad - BDL; SWPC - 88 ug/L</u>
<u>Trichloroethene:</u>	<u>Max Observed Conc. - 62 ug/L;</u>	<u>Furthest down grad - 15 ug/L. SWPC - 2,340 ug/L</u>
<u>1,1,1-Trichloroethane:</u>	<u>Max Observed Conc. - 260 ug/L.</u>	<u>Furthest down-grad - 18 ug/L. SWPC - 62,000 ug/L</u>

Concentrations are seen to decrease in concentration with increasing distance from the source area.

The Surface water Protection Criteria were developed to be protective of aquatic resources and potential uses of surface waters. Based on the above, discharge of the diluted plume, if any, to the river is not anticipated to have an impact on the receiving water or aquatic organisms

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the discharge of “contaminated” groundwater into surface water be shown to be “currently acceptable” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of “contaminated” groundwater can not be shown to be “currently acceptable”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s): _____

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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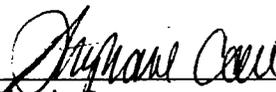
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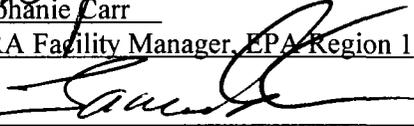
8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Edelman Leather (former CEE Assoc./ InteliData) facility, EPA ID # CTD044121697, located at 80 Pickett District Rd., New Milford, CT. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Completed by (signature)  Date 9/25/2008
(print) Stephanie Carr
(title) RCRA Facility Manager, EPA Region 1

Supervisor (signature)  Date 9/25/08
(print) James S. Chow
(title) Chief, RCRA Corrective Action Section
(EPA Region or State) EPA Region 1

Locations where References may be found:

References may be found at the EPA Region I RCRA Record Center, located at 1 Congress St., Boston, MA.

Contact telephone and e-mail numbers

(name) Stephanie Carr
(phone #) 617/918-1363
(e-mail) carr.stephanie@epa.gov

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-01

Report Date: 9/12/2008
 Date(s) Sampled: 09/11/2008 - 09/11/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520, SW8260B
 Results Given as: ug/L

Sample Name:	CAS #	000.00	011.95	046.20
		WP-ACH-01-09/11/08EB	WP-ACH-01-09/11/08N	WP-ACH-01-09/11/08N
Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
1,1-Dichloroethene	75-35-4	2.0 U	2.0 U	58
Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
1,1-Dichloroethane	75-34-3	2.0 U	2.0 U	56
cis-1,2-Dichloroethane	156-59-2	2.0 U	2.0 U	12
Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
1,1,1-Trichloroethane	71-55-6	2.0 U	29	200
1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
Trichloroethene	79-01-6	2.0 U	2.0 U	49
Tetrachloroethene	127-18-4	2.0 U	2.0 U	2.6
1,4-Dioxane	123-91-1	50 U	50 U	50 U
Bromofluorobenzene (SS)	460-00-4	109 %	102 %	110 %

U = Not detected above the specified reporting limit.
 J = Estimated value.
 E = Estimated value, marginally above the calibration levels.
 D = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-02

Report Date: 9/12/2008
 Date(s) Sampled: 09/11/2008 - 09/11/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520,SW8260B
 Results Given as: ug/L

Depth: Sample Name: Analysis Date:	CAS #	000.00	012.43	044.11
		WP-ACH-02- 09/11/08 EB	WP-ACH-02- 09/11/08 N	WP-ACH-02- 09/12/08 N
Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
1,1-Dichloroethene	75-35-4	2.0 U	24	76
Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
1,1-Dichloroethane	75-34-3	2.0 U	5.5	64
cis-1,2-Dichloroethene	156-59-2	2.0 U	5.5	14
Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
1,1,1-Trichloroethane	71-55-6	2.0 U	260	220
1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
Trichloroethene	79-01-6	2.0 U	20	59
Tetrachloroethene	127-18-4	2.0 U	3.0	2.9
1,4-Dioxane	123-91-1	50 U	50 U	50 U
Bromofluorobenzene (SS)	460-00-4	109 %	102 %	104 %

U = Not detected above the specified reporting limit.
 J = Estimated value.
 E = Estimated value, marginally above the calibration levels.
 D = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-03

Report Date: 9/12/2008
 Date(s) Sampled: 09/11/2008 - 09/11/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520, SW8260B
 Results Given as: ug/L

Depth:	CAS #	000.00	012.84	040.91
		WP-ACH-03-	WP-ACH-03-	WP-ACH-03-
Sample Name:		09/11/08EB	09/11/08N	09/12/08N
Analysis Date:				
Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
1,1-Dichloroethene	75-35-4	2.0 U	14	55
Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
1,1-Dichloroethane	75-34-3	2.0 U	4.7	49
cis-1,2-Dichloroethene	156-59-2	2.0 U	2.9	12
Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
1,1,1-Trichloroethane	71-55-6	2.0 U	140	180
1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
Trichloroethene	79-01-6	2.0 U	13	52
Tetrachloroethene	127-18-4	2.0 U	2.0 U	2.2
1,4-Dioxane	123-91-1	50 U	50 U	50 U
Bromofluorobenzene (SS)	460-00-4	106 %	103 %	106 %

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 E = Estimated value, marginally above the calibration levels.
 D = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-04

Report Date: 9/12/2008
 Date(s) Sampled: 09/11/2008 - 09/12/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520, SW8260B
 Results Given as: ug/L

Sample Name:	Depth:	CAS #	000.00	010.00	030.60
			WP-ACH-04- 09/12/08EB	WP-ACH-04- 09/12/08N	WP-ACH-04- 09/12/08N
Chloromethane		74-87-3	5.0 U	5.0 U	5.0 U
Vinyl Chloride		75-01-4	2.0 U	2.0 U	2.0 U
Chloroethane		75-00-3	2.0 U	2.0 U	2.0 U
1,1-Dichloroethene		75-35-4	2.0 U	10	42
Methylene Chloride		75-09-2	2.0 U	2.0 U	2.0 U
trans-1,2-Dichloroethene		156-60-5	2.0 U	2.0 U	2.0 U
1,1-Dichloroethane		75-34-3	2.0 U	3.1	47
cis-1,2-Dichloroethene		156-59-2	2.0 U	2.8	6.8
Chloroform		67-66-3	2.0 U	2.0 U	2.0 U
Carbon Tetrachloride		56-23-5	2.0 U	2.0 U	2.0 U
1,1,1-Trichloroethane		71-55-6	2.0 U	130	11
1,2-Dichloroethane		107-06-2	2.0 U	2.0 U	2.0 U
Trichloroethene		79-01-6	2.0 U	10.0	44
Tetrachloroethene		127-18-4	2.0 U	2.0 U	2.6
1,4-Dioxane		123-91-1	50 U	50 U	50 U
Bromofluorobenzene (SS)		460-00-4	113 %	108 %	112 %

U = Not detected above the specified reporting limit.
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 D = Sample analyzed at a dilution.

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 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-05

Report Date: 9/12/2008
 Date(s) Sampled: 09/12/2008 - 09/12/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520,SW8280B
 Results Given as: ug/L

Depth:	Sample Name:	CAS #	000.00	009.74	051.71
			WP-ACH-05- 09/12/08	WP-ACH-05- 09/12/08	WP-ACH-05- 09/12/08
	Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
	Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
	Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
	1,1-Dichloroethene	75-35-4	2.0 U	12	64
	Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
	trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
	1,1-Dichloroethane	75-34-3	2.0 U	3.1	83
	cis-1,2-Dichloroethene	156-59-2	2.0 U	2.8	11
	Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
	Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
	1,1,1-Trichloroethane	71-55-6	2.0 U	86	2.0 U
	1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
	Trichloroethene	79-01-6	2.0 U	20	62
	Tetrachloroethene	127-18-4	2.0 U	2.0 U	2.0 U
	1,4-Dioxane	123-91-1	50 U	50 U	50 U
	Bromofluorobenzene (SS)	460-00-4	112 %	105 %	106 %

U = Not detected above the specified reporting limit.
 J = Estimated value.
 E = Estimated value, marginally above the calibration levels.
 D = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-06

Report Date: 9/12/2008
 Date(s) Sampled: 09/12/2008 - 09/12/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520, SW8260B
 Results Given as: ug/L

Depth:	Sample Name:	CAS #	000.00	009.49	037.50
			WP-ACH-06-	WP-ACH-06-	WP-ACH-06-
Analysis Date:			09/12/08	09/12/08	09/12/08
	Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
	Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
	Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
	1,1-Dichloroethene	75-35-4	2.0 U	6.4	29
	Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
	trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
	1,1-Dichloroethane	75-34-3	2.0 U	2.6	38
	cis-1,2-Dichloroethene	156-59-2	2.0 U	2.3	4.7
	Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
	Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
	1,1,1-Trichloroethane	71-55-6	2.0 U	87	10
	1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
	Trichloroethene	79-01-6	2.0 U	8.9	34
	Tetrachloroethene	127-18-4	2.0 U	2.0 U	2.0 U
	1,4-Dioxane	123-91-1	50 U	50 U	50 U
	Bromofluorobenzene (SS)	460-00-4	108 %	113 %	108 %

U = Not detected above the specified reporting limit.
 J = Estimated value.
 E = Estimated value, marginally above the calibration levels.
 O = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

Client: ERM
Location: New Milford, CT
Project ID: N. Milford
SEI Project No: 071871-R
Matrix: Groundwater
Well ID: WP-ACH-07

Report Date: 9/12/2008
Date(s) Sampled: 09/12/2008 - 09/12/2008
Date(s) Analyzed: 09/11/2008 - 09/12/2008
Test Method: 06520, SW8260B
Results Given as: ug/L

Sample Name:	CAS #	000.00	008.13	042.78
		WP-ACH-07-09/12/08EB	WP-ACH-07-09/12/08N	WP-ACH-07-09/12/08N
Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
1,1-Dichloroethene	75-35-4	2.0 U	8.6	48
Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
1,1-Dichloroethane	75-34-3	2.0 U	7.4	71
cis-1,2-Dichloroethene	156-59-2	2.0 U	2.3	13
Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
1,1,1-Trichloroethane	71-55-6	2.0 U	59	2.6
1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
Trichloroethene	79-01-6	2.0 U	12	50
Tetrachloroethene	127-18-4	2.0 U	2.0 U	2.0 U
1,4-Dioxane	123-91-1	50 U	50 U	50 U
Bromofluorobenzene (SS)	460-00-4	111 %	106 %	110 %

U = Not detected above the specified reporting limit.
 J = Estimated value.
 E = Estimated value, marginally above the calibration levels.
 D = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.

Onsite Laboratory Results Mobile Laboratory 2

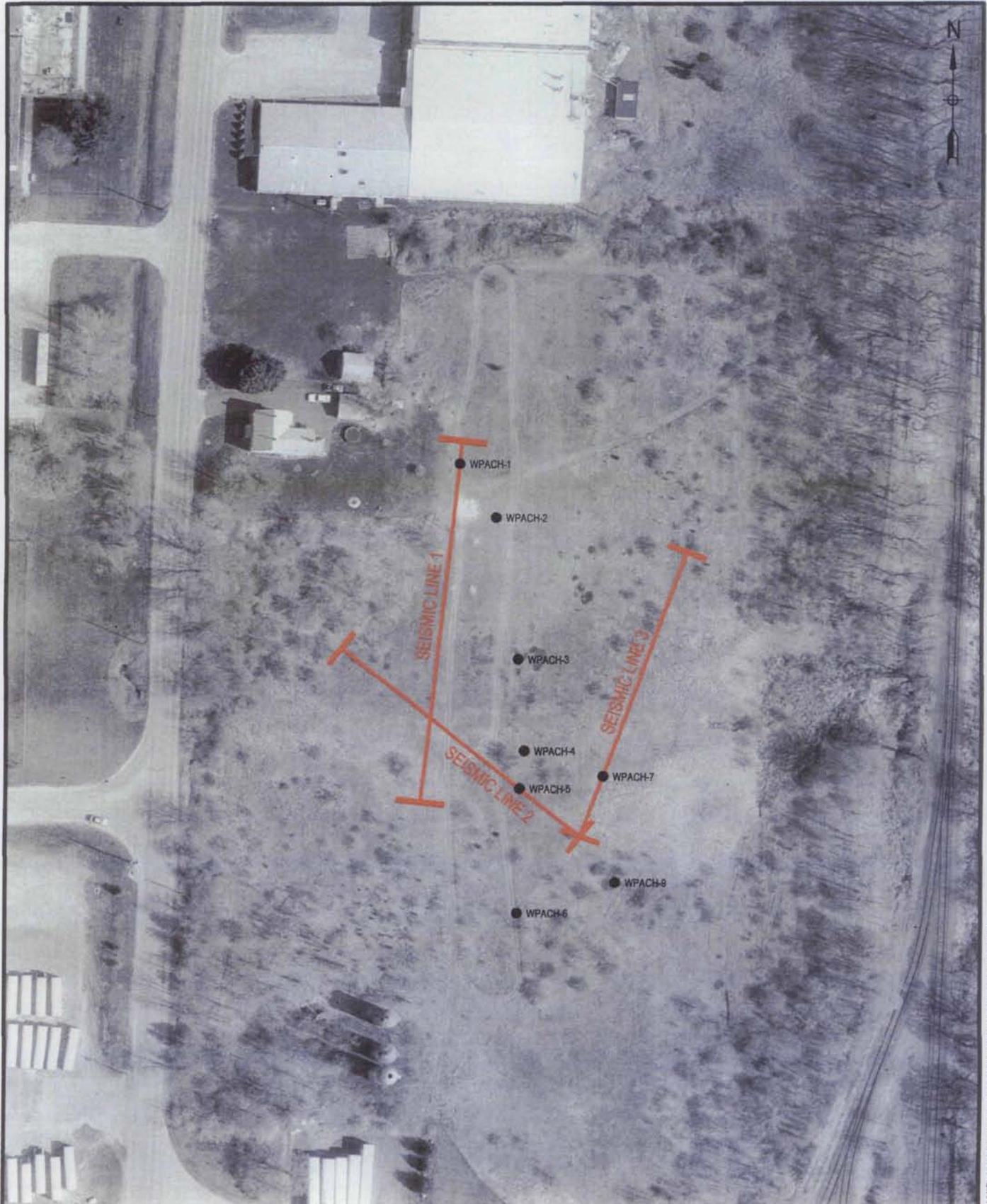
Client: ERM
 Location: New Milford, CT
 Project ID: N. Milford
 SEI Project No: 071871-R
 Matrix: Groundwater
 Hole ID: WP-ACH-08

Report Date: 9/12/2008
 Date(s) Sampled: 09/12/2008 - 09/12/2008
 Date(s) Analyzed: 09/11/2008 - 09/12/2008
 Test Method: D6520, SW8260B
 Results Given as: ug/L

Sample Name: Analysis Date:	Depth: CAS #	000.00	009.74	038.74
		WP-ACH-08- 09/12/08EB	WP-ACH-08- 09/12/08N	WP-ACH-08- 09/12/08N
Chloromethane	74-87-3	5.0 U	5.0 U	5.0 U
Vinyl Chloride	75-01-4	2.0 U	2.0 U	2.0 U
Chloroethane	75-00-3	2.0 U	2.0 U	2.0 U
1,1-Dichloroethene	75-35-4	2.0 U	2.0 U	14
Methylene Chloride	75-09-2	2.0 U	2.0 U	2.0 U
trans-1,2-Dichloroethene	156-60-5	2.0 U	2.0 U	2.0 U
1,1-Dichloroethane	75-34-3	2.0 U	2.0 U	13
cis-1,2-Dichloroethene	156-59-2	2.0 U	2.0 U	2.0 U
Chloroform	67-66-3	2.0 U	2.0 U	2.0 U
Carbon Tetrachloride	56-23-5	2.0 U	2.0 U	2.0 U
1,1,1-Trichloroethane	71-55-6	2.0 U	2.0 U	18
1,2-Dichloroethane	107-06-2	2.0 U	2.0 U	2.0 U
Trichloroethene	79-01-6	2.0 U	2.0 U	15
Tetrachloroethene	127-18-4	2.0 U	2.0 U	2.0 U
1,4-Dioxane	123-91-1	50 U	50 U	50 U
Bromofluorobenzene (SS)	460-00-4	109 %	99 %	97 %

U = Not detected above the specified reporting limit.
 J = Estimated value.
 E = Estimated value, marginally above the calibration levels.
 D = Sample analyzed at a dilution.

N = Normal sample.
 EB = Equipment Blank
 B = Indicates blank contamination.



Legend
 — Proposed Geophysical Line
 ● WPACH-3 ● WaterLoo Profiler Location

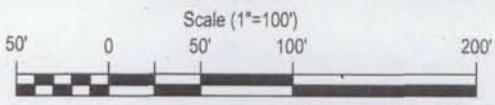


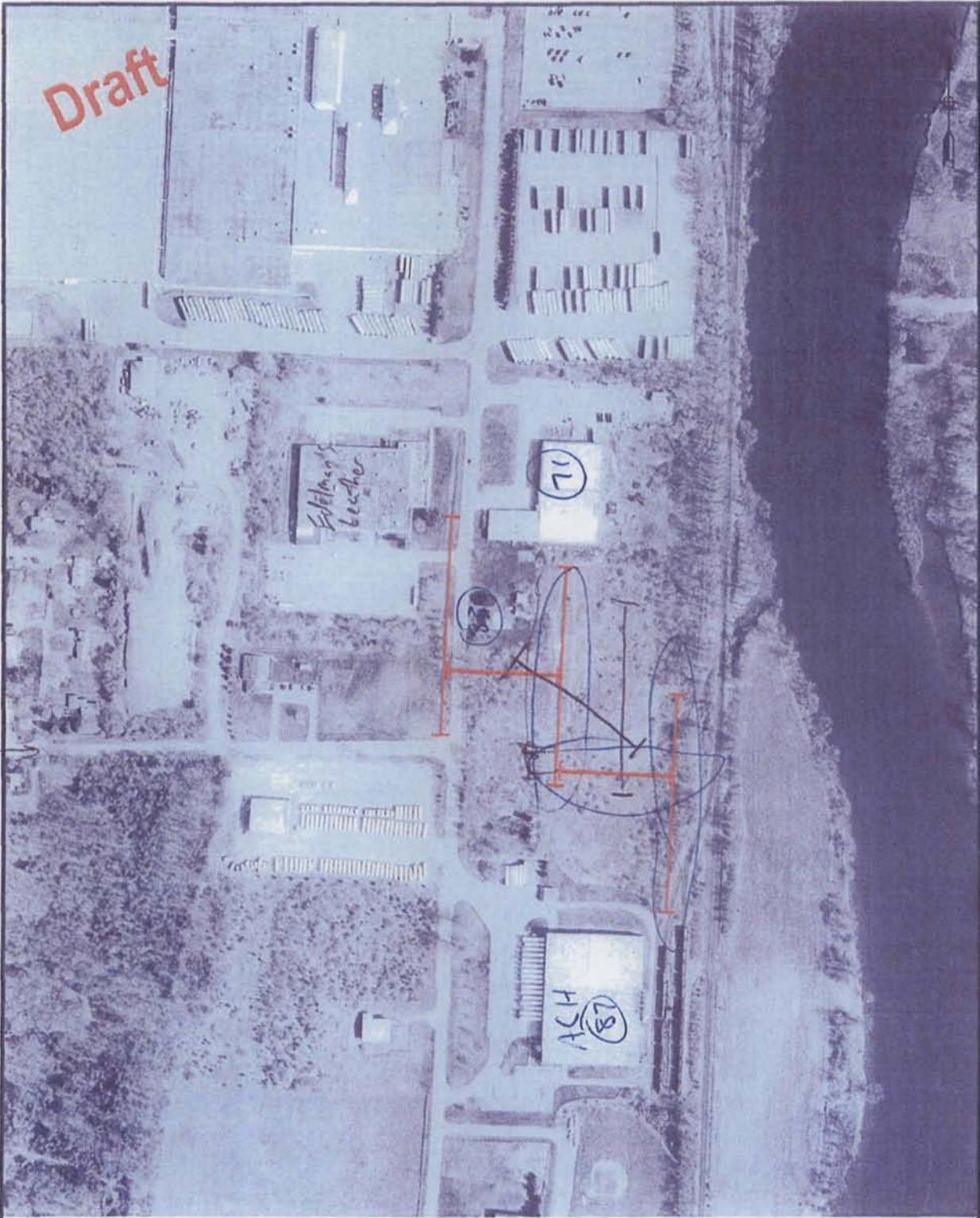
Figure 1 - Geophysical Survey
 80 Pickett District Road, New Milford, CT



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Draft

Doubt Rd



Legend
 — Proposed Geophysical Line

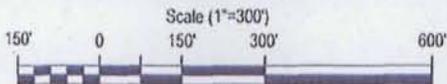
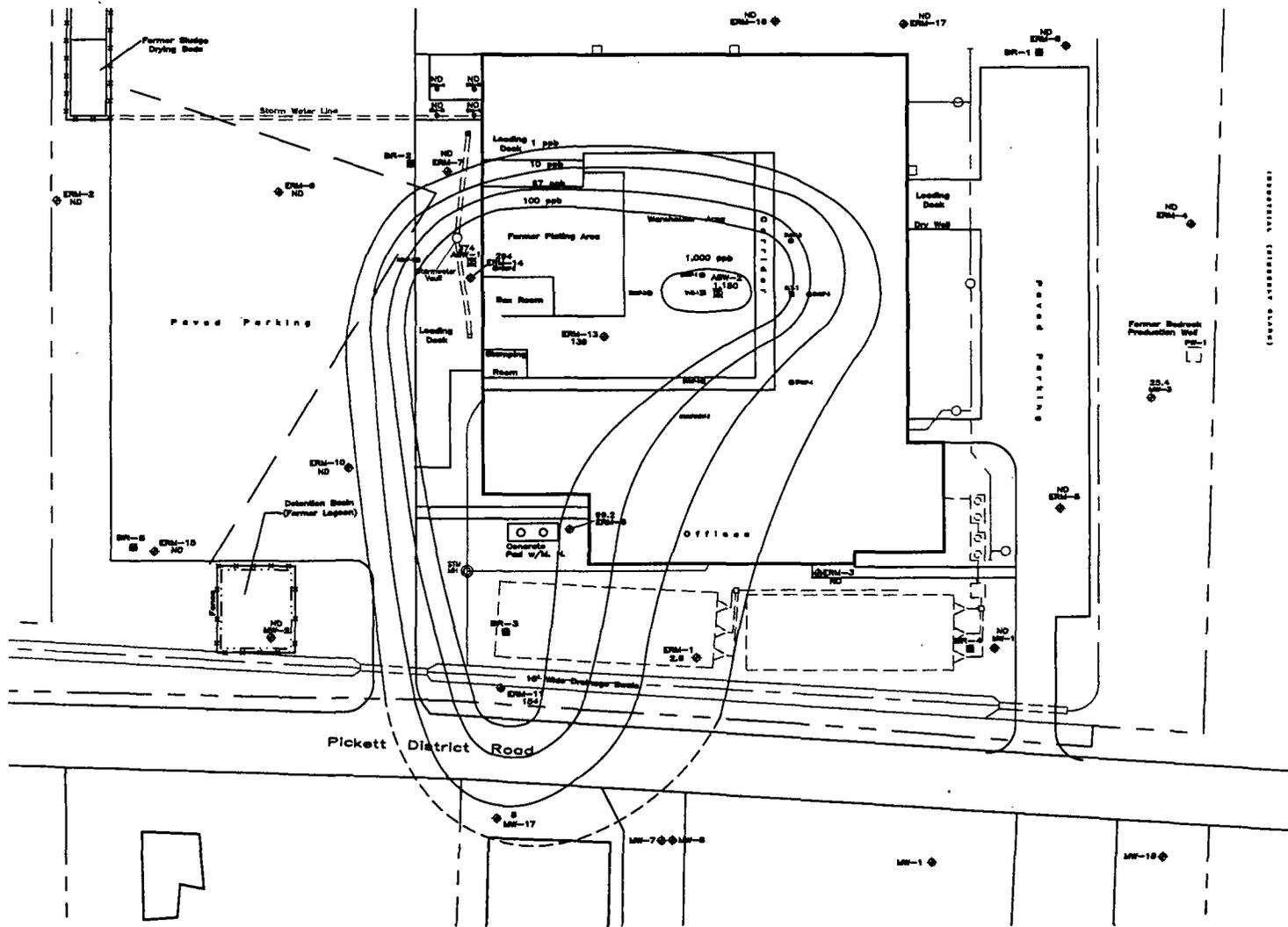


Figure 2 - Proposed Geophysical Survey
 80 Pickett District Road, New Milford, CT



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LEGEND
 MW-1-50 Monitoring Well
 EM-1-17 Injection Point
 EM-1-17 Backup Well
 TCE plume
 TCE plume concentration (ppb)

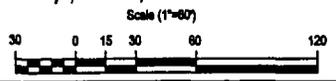


Figure 3 Extent of TCE in Overburden Groundwater
 80 Pickett District Road, New Milford, Connecticut



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